

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

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GE DANDONG; LOH TUCK WOH PETER; :  
SINGAPORE GOVERNMENT STAFF CREDIT : Case No.: 1:10-cv-08086 (JMF) (GWG)  
COOPERATIVE SOCIETY, LTD; NI YAN AMY; :  
ANG SOO CHENG; CHOH GEK HONG :  
JOHNSON; NG SHOOK PHIN SUSAN; and :  
ZHAO YUZHENG, :  
Plaintiffs, :  
: :  
-vs.- :  
PINNACLE PERFORMANCE LIMITED; :  
MORGAN STANLEY ASIA (SINGAPORE) PTE; :  
MORGAN STANLEY & CO. INTERNATIONAL :  
PLC; MORGAN STANLEY CAPITAL SERVICES :  
INC.; MORGAN STANLEY & CO. INC.; and :  
MORGAN STANLEY, :  
: :  
Defendants. :  
-----x

**DECLARATION OF ANDREW D. W. CATTELL**

Andrew D. W. Cattell, pursuant to 28 U.S.C. § 1746, declares under penalty of perjury as follows:

1. I am associated with the firm of Simpson Thacher & Bartlett LLP, attorneys for Defendants Pinnacle Performance Limited, Morgan Stanley Asia (Singapore) Pte., Morgan Stanley & Co. International plc, Morgan Stanley Capital Services LLC (formerly known as Morgan Stanley Capital Services Inc.), Morgan Stanley & Co. LLC (formerly known as Morgan Stanley & Co. Inc.), and Morgan Stanley. I am an attorney duly admitted to practice in the State of New York and the Southern District of New York. I respectfully submit this declaration in support of Defendants' motion to exclude the declarations of Plaintiffs' proffered

experts Ilya Eric Kolchinsky and Craig A. Wolson. I am fully familiar with the facts and circumstances stated herein based upon my personal knowledge, the attached documents, and a review of the files maintained by my firm.

2. Attached hereto as Exhibit 1 is a true and correct copy of the current transcript of Ilya Eric Kolchinsky's April 18, 2013 deposition.

3. Attached hereto as Exhibit 2 is a true and correct copy of the current transcript of Craig A. Wolson's April 12, 2013 deposition.

4. Attached hereto as Exhibit 3 is a true and correct copy of the proffered expert declaration of Ilya Eric Kolchinsky, dated February 5, 2013.

5. Attached hereto as Exhibit 4 is a true and correct copy of the proffered expert declaration of Craig A. Wolson, dated February 4, 2013.

6. Attached hereto as Exhibit 5 is a true and correct copy of the Monetary Authority of Singapore's Investigation Report on the Sale and Marketing of Structured Notes Linked to Lehman Brothers, dated July 2009, as obtained from the Monetary Authority of Singapore's web site. Available at <http://www.mas.gov.sg/News-and-Publications/Press-Releases/2009/MAS-Releases-Investigation-Findings-on-the-Sale-and-Marketing-of-Structured-Notes-Linked-to-Lehman-Brothers.aspx>.

7. Attached hereto as Exhibit 6 is a true and correct copy of the rebuttal expert declaration of Ethan Cohen-Cole, dated February 26, 2013.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on the 25th day of April, 2013.

  
Andrew D. W. Cattell